BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking Regarding Policies, Procedures and Rules for Development of Distribution Resources Plans Pursuant to Public Utilities Code Section 769.	Rulemaking 14-08-013 (Filed August 14, 2014)

COMMENTS OF THE OFFICE OF RATEPAYER ADVOCATES ON THE ASSIGNED COMMISSIONER'S RULING RE DRAFT GUIDANCE FOR USE IN UTILITY AB 327 (2013) SECTION 769 DISTRIBTUION RESROUCE PLANS

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I. INTRODUCTION

Pursuant to the *Assigned Commissioner's Ruling Re Draft Guidance for Use in Utility AB 327 (2013) Section 769 Distribution Resource Plans* (ACR or Draft Guidance), dated November 17, 2014, and Chief Administrative Law Judge Timothy Sullivan's Ruling granting the Motion of the investor-owned electric utilities (IOUs) for extension of time for filing comments on the Draft Guidance, dated November 26, 2014, the Office of Ratepayer Advocates (ORA) respectfully submits the following comments on the Draft Guidance related to the content and structure of the Distribution Resources Plans (DRPs) that will be filed by the IOUs and small and multi-jurisdictional utilities on July 1, 2015.

On August 14, 2014, the California Public Utilities Commission (Commission) initiated Rulemaking (R. 14-08-013) to establish policies, procedures, and rules to guide California IOUs in developing their DRPs. The Rulemaking will also evaluate the IOUs' existing and future electric distribution infrastructure and planning procedures with respect to incorporating Distributed Energy Resources (DERs)[1] into the planning and operation of their electric distribution systems. The Draft Guidance sets out preliminary guidance for content and structure of the DRPs. Specifically, the Draft Guidance specifies the requirements for the DRPs, including: (a) the development of integration capacity and locational value analysis tools; (b) the development of demonstration projects; (c) the provision of data access; (d) an assessment of tariff and contract implications; (e) the identification of safety considerations; (f) the description of barriers to DER deployment; (g) an explanation of how the DRP filings will be coordinated with the IOUs' general rate cases; and (h) a description of proposed next steps.[2]

ORA generally supports the proposals in the Draft Guidance. The Draft Guidance makes the distribution grid more open, efficient and resilient. In these

[1] Section 769 of the PU Code defines "distributed resources" to mean distributed renewable generation resources, energy efficiency, energy storage, electric vehicles, and demand response technologies.

[2] Draft Guidance at 15-26.

comments, ORA identifies the portions of the Draft Guidance that ORA supports and recommends refinements to others to better protect ratepayers and to ensure the structure and content of the DRPs is consistent. In summary, ORA recommends that the Commission:

- Maintain a procedural separation between the Rulemaking and the Applications by not consolidating the DRP Applications with this Rulemaking;
- Require the IOUs to develop a service oriented distribution planning process to (1) forecast the growth of the DERs, (2) identify problems of integrating those DERs and recommend solutions to solve the identified problems, and (3) develop distribution project proposals;
- Require the IOUs to implement the demonstration projects in phases so that lessons learned during the implementation of the locational benefit demonstration projects can be applied;
- Rely on the rules and protocols established in Decision (D.)14-05-016 for access to customer energy data, and host a workshop or other forum to discuss what types of data are necessary, at what granularity, and outline the applicable rules governing the release and protection of utility data;
- Require the identification of potential reliability and safety standards that DERs must meet, including national and international open standards, so as to minimize reliance upon proprietary or local standards;
- Expand the category list of barriers to include a category for "Developer" obstacles, such as land cost or right-of-way costs because successful integration of DERs into the distribution grid will also depend on whether developers are able to interconnect at preferred locations;
- Expand the definition of "Grid Insight" to include cost upgrades triggered by DER interconnection; and
- Ensure the IOU's forecast of costs be incurred in order to upgrade the distribution infrastructure to accomplish the DRPs should be evaluated to be just and reasonable.

II. DISCUSSION

A. Categorization of Utility DRP Filings: Maintain a Procedural Separation Between the Rulemaking and the Applications

The Draft Guidance proposes that the IOUs file their DRPs as Applications, which the Commission may then consolidate with this Rulemaking into a single proceeding.[3] ORA agrees that the IOUs should file the DRPs as Applications, but recommends the Commission maintain a procedural separation between the Rulemaking and the forthcoming DRP Applications so as not to confuse the objectives of each proceeding.

The objective of this Rulemaking is to "establish policies, procedures, and rules to guide"[4] the IOUs in developing their respective DRPs. Assembly Bill (AB) 327 requires the Commission to "approve, or modify and approve" each DRP proposal submitted by an IOU.[5] The Commission's review of the DRP Applications should focus on whether each utility's DRP is consistent with AB 327 and adheres to any requirements created by this Rulemaking.

ORA's recommendation to separate this Rulemaking from the forthcoming DRP Application proceeding is consistent with the Commission's actions in the Smart Grid rulemaking (R.08-12-009) in which the IOUs were ordered to file Smart Grid Deployment Plans (SGDP) for review and approval.[6] In R.08-12-009,[7] the Commission adopted policies and guidelines for the IOUs to use to draft and submit their respective SGDP Applications. By requiring the IOUs to file separate SGDP Applications,[8] the Commission was able to address a number of broad policy matters

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[3] Draft Guidance at 14.

[4] Draft Guidance at 1.

[5] *See*, Public Utilities (PU Code Section 769(c).

[6] *See*, PU Code Section 8364(a) "By July 1, 2011, each electrical corporation shall develop and submit a smart grid deployment plan to the commission for approval." *Also see*, D.10-06-047.

[7] Smart Grid Proceeding.

[8] D.10-06-07, Ordering Paragraph 1, at 138.

in the rulemaking (some unrelated to the SGDPs), while providing stakeholders an opportunity to specifically concentrate on a thorough review of the issues presented in the SGDPs, and not relitigate larger policy issues addressed in the rulemaking. ORA recommends the Commission adopt the same procedural mechanism here.

Lastly, maintaining a procedural separation between the Rulemaking and the DRP Applications ensures that the Commission may conclude its business in the Rulemaking in a timely manner. The Draft Guidance proposes to institute several "Phases" or "Phasing of Next Steps" to possibly consider scopes for subsequent DRPs.[9] Since the Draft Guidance envisions an interminable timeline to execute the "Phases,"[10] the reliance on a single proceeding may result in the Rulemaking being open in perpetuity. The Commission has taken the necessary steps to avoid lengthy proceedings by using rulemakings to adopt requirements and create policy while utilizing Applications to ensure compliance and necessary refinements. Recent examples include the Commission's decisions in the Smart Grid,[11] Electric Program Investment Charge (EPIC),[12] and Energy Storage Procurement[13] proceedings. ORA recommends the Commission adopt a similar approach here.

B. Integration Capacity and Locational Value Analysis: Require the IOUs to Develop a Service Oriented Distribution Planning Process

1. Integration Capacity Analysis: Integration Capability is Only One of the Inputs the DER Developers Consider in Planning for DER Projects

ORA generally agrees with the Draft Guidance's intention to improve communication between the IOUs and the DER developers on how to fully utilize the existing distribution system to accommodate DER interconnection. However, the

[9] Draft Guidance at 24.

[10] Draft Guidance at 23-26.

[11] *See*, D.10-06-047 in R. 08-12-009.

[12] *See*, D.12-05-037 in R.11-10-003.

[13] *See*, D.13-10-040 in R.10-12-007.

Commission should be aware that integration capability is only one of the inputs DER developers consider in planning for DER projects. DER developers also consider other inputs such as the availability of energy resources, power generation technology, cost of land use, project construction cost, environmental impacts and related mitigation cost, locational marginal price of the wholesale power market at that location, and regulatory risks. As a result of all these factors, some of the available distribution capability may be under-utilized by the DERs in one area, while the distribution capability in other areas may be insufficient for DERs interconnection. Similarly, while the communications between the IOUs and DER developers on the optimal locations for DERs interconnection is important, the Commission should be aware that the optimal location from the IOUs' perspective is not necessarily the optimal location from the DER developer's perspective. Minimizing interconnection cost is only one of the inputs the DER developers consider in planning for DER projects. As mentioned previously, DER developers also consider other inputs. As a result of these factors, DERs may not be developed at the "optimal locations" as identified by the IOUs, and instead some DERs may be developed in sub-optimal locations. Thus, the analysis of the value of DERs interconnection should consider all the factors noted above.

2. Optimal Location Benefit Analysis: Require the IOUs to Develop a Methodology that Considers both Locational Cost and Benefit

The Draft Guidance lists nine criteria in developing the unified locational net benefit methodology.[14] The Commission appears to emphasize the benefit of the DERs, but not the costs to integrate the DERs. DERs in different locations will have different impacts on the distribution system. For example, in a location where power supply is less than power demand, the power shortfall may be rectified by remote power resources. In order to deliver the remote power supply, the distribution system in this location may need to be upgraded. If a DER is developed in this location, it can be used to serve the local demand. As a result, the power shortfall may be eliminated and the distribution

[14] Draft Guidance at 16-17.

upgrade may not be needed. The DER in this location is then valued higher because it satisfies the needed energy and it can delay distribution upgrade.

However, in another location where the supply is more than demand, the surplus generation must be delivered to the transmission grid. In this location, if a DER is developed, it will worsen the surplus supply scenario and increase the need for distribution upgrade to deliver the surplus energy to the transmission grid.

Given the above examples, we can see that a DER could benefit the distribution in one location and could increase the distribution cost in another location. Therefore, the Commission should require the IOUs to develop a methodology that considers both cost and benefit associated with, but not limited to (1) capital investment in transmission and distribution construction, (2) transmission and distribution operation and maintenance, (3) transmission and distribution losses, (4) DER interconnection, (5) energy and congestion in the transmission and distribution systems, (6) power supply reliability, (7) environmental impact, and (8) societal impacts.

3. DER Growth Scenarios: The Distribution Planning Process Should Be Similar to the Transmission Planning Process

ORA agrees with the Commission's requirement as described in Part Four, Section 1.c (DER Growth Scenarios) of the Draft Guidance.[15] While the functionality of the transmission network is to exchange power between service areas, the functionality of the distribution system is to distribute power to end-use customers in each service area. The power flow on transmission is bi-directional while the power flow on distribution is generally uni-directional from the high voltage side to the low voltage side of the distribution substations. In the future, with ever-increasing penetration of DERs' interconnections, distribution systems will resemble transmission systems. For example, when the local demand interconnected to a distribution substation cannot use up the power generated by the local DERs interconnected to the same distribution substation, the power could flow back to the high voltage side of the distribution substation. When

[15] Draft Guidance at 17.

power begins to flow back and forth on both transmission and distribution systems, it will be difficult to draw a clear physical line between both systems. As a result, the distribution planning process should be similar to the transmission planning process.

From an energy service perspective, both transmission and distribution planning are similar in that they are developed to provide power delivery services so power supply and demand transactions can be conducted. Under Federal Energy Regulatory Commission (FERC) rule,[16] transmission service providers are required to provide open access and non-discriminatory power delivery services to transmission customers, including third party customers. Similarly, the Commission should require the distribution service providers to provide open access and non-discriminatory power delivery services to distribution customers. Therefore the distribution planning process should be similar to the transmission planning process to ensure adequate distribution capability for DER integration.

In California, the California Independent System Operators (CAISO) conducts an annual transmission planning process for the CAISO-controlled transmission grid. The goal of the CAISO, as transmission service provider, is to ensure adequate transmission services for bulk generation and demand at the transmission level. The CAISO transmission planning process is divided into three steps: [17]

1) The development of a unified planning assumptions and study plan;
2) Studies to finalize the comprehensive transmission plan; and
3) Solicitation of project sponsors for the development of transmission projects identified in the comprehensive transmission plan.

Similarly, IOUs regulated by the Commission should conduct distribution planning for their respective distribution systems. The goal of the IOUs, as distribution service providers, should be to ensure adequate distribution services for DERs' interconnections and end-use demand, including electric vehicles, at the distribution

[16] Federal Energy Regulatory Commission (FERC) Order 890.

[17] CAISO Transmission Planning Process Business Practice Manual.

level. The IOUs should not have to reinvent a model for the distribution planning; they can simply adopt a distribution planning process that is similar to the CAISO transmission planning process. For distribution planning, the IOUs should:

1) Forecast the growth of the DERs and demand, including electric vehicles. The Draft Guidance Part Four Section 1.c lists three scenarios which can be used to conduct the forecast;
2) Conduct studies to develop a comprehensive distribution plan; and
3) Develop distribution project proposals.

In its transmission planning process, the CAISO uses a Transmission Economic Assessment Methodology[18] for its economic transmission studies. The Commission should require the IOUs to build a similar methodology that can be used to economically evaluate their distribution systems.

Transmission planning and distribution planning are still different—transmission planning considers a bigger geographic area, while distribution planning considers a small local area that is served by a distribution substation. ORA recommends the Draft Guidance clearly defines distribution planning and transmission planning so there is neither gap nor overlap between the two planning processes; this will aid in improving the coordination between both processes.

C. Demonstration and Deployment: Require the IOUs to Implement the Demonstration Projects in Phases

ORA supports the Draft Guidance's proposal that the IOUs should develop DER-focused demonstration projects and deploy said projects in an effort to demonstrate how locational benefits analysis has been integrated into the IOUs' distribution planning and operations.[19] ORA recommends that the three demonstration projects listed in the Draft Guidance: Sections 2b (demonstrate DER locational benefits), 2c (demonstrate distribution operations at high penetrations of DER), and 2d (demonstration distribution

[18] CAISO Business Practice Manual for Transmission Planning Process.

[19] Draft Guidance at 18.

marginal pricing) [20] should be implemented by the IOUs in stages so that lessons learned during the implementation of the locational benefit demonstration project can be applied during the development and implementation of the high-penetration-of-DER demonstration project and the distribution-marginal-pricing demonstration project.

ORA supports the development of a detailed, location-specific computation of the marginal costs of distribution services, completely analogous to the Locational Marginal Price ("LMP") for energy.[21] ORA agrees with the Draft Guidance's proposal that making public the distribution marginal prices that are derived from this project is important because the efficient incentives presented by distribution marginal pricing can induce DER resources to locate and operate so they can provide distribution system benefits.[22]

D. Data Access: Use the Rules and Protocols Established in D.14-05-016 for Access to Customer Energy Data in the Interim and then Hold a Workshop to Discuss Additional Requirements for the Release and Protection of Utility and Customer Data

ORA supports the Draft Guidance's proposal to rely on the rules and protocols established in D.14-05-016,[23] which provides access to customer energy usage and usage-related data to authorized third parties while protecting privacy of personal data. To provide further clarification, the Commission also issued D.11-07-056 in 2011, adopting rules to protect the privacy and security of customer energy usage data pursuant to Senate Bill (SB) 1476.[24] Additionally, in 2013, the Commission issued D.13-09-025,[25] which approved the IOUs' applications to provide third parties access to customer data when requested by the customer. In recognition of these additional customer energy usage data privacy protections, the Draft Guidance appropriately notes that issues related to access

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[20] Draft Guidance at 19.

[21] *Id*.

[22] *Id. See,* Sotkiewicz, Paul M. & Vignol, Jesus M., Nodal Pricing for Distribution Networks: Efficient Pricing for Efficiency Enhancing Distributed Generation. IEEE Trans. Power Syst. 21 (2) 2006.

[23] Draft Guidance at 20.

[24] *See*, PU Code Section 8380.

[25] *See*, D.13-09-025; in A.12-03-002 et al.

of customer energy usage data were recently litigated in D.14-05-016[26] and, thus, should not be subject to further consideration here. ORA agrees.

In terms of general data access issues, the Draft Guidance provides the following statement:

> Many of the above sections require various amounts and types of data to be transferred between the utilities and third parties. In some cases, the Utilities may "own" (generate or acquire) the data and in some cases the data may be owned or generated by either the customer or the third party. Data sharing involves a mechanism for communicating the data among the Utilities, customers and DER owners/operators. The type of data that will be shared depends necessarily on the proposed user of the data, and what the use of the data enables, by customers, the market, and Utility.[27]

The Draft Guidance then identifies many different types of data that parties mentioned in their responses as important to furthering the goals of the DRP process.[28] Though data may be useful to the DRP process and certain participants to this proceeding, the Commission should cautiously consider what types of data is made available and for what specific purposes. As witnessed in the Smart Grid proceeding regarding customer energy usage data, it is critical that the Commission and stakeholders carefully balance the risk and reward of disclosing potentially sensitive utility and customer data. It is also important that the IOUs and stakeholders confer to attain a general consensus on data uniformity and mechanisms to release data.

Therefore, before the IOUs include in their DRPs any proposed policies on data sharing, procedures for data sharing, and current plans for obtaining data from smart meters "that reflect power quality and other factors,"[29] ORA recommends the

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[26] Draft Guidance at 20.

[27] Draft Guidance at 19-20.

[28] Draft Guidance at 20.

[29] Draft Guidance at 20-21.

Commission hold a workshop to specifically consider the types of data that is absolutely necessary for the DRPs, and the standard and protection protocols that will be used in the communication of the data. Such a forum may also provide parties the opportunity to examine applicable Commission rules and other laws governing data access so that the issue does not needlessly burden the DRP Application proceeding. Until such a discussion and review is complete, ORA reiterates its position that the Commission rely upon its current data access practices in the interim and not use this proceeding to establish new processes and practices for parties to obtain protected and proprietary IOU and DER customers' data.

E. Safety Consideration: The Consistent Use of National and International Open Standards Is the Best Means to Support Safety and Reliability in the Modern Distribution System

ORA concurs with the Draft Guidance's assessment that new standards, or modifications of existing standards, for electrical safety and reliability may be necessary to accommodate increased levels of DER.[30]

ORA also supports the Draft Guidance's proposal that in the DRPs, the IOUs should identify potential reliability and safety standards that DERs must meet and suggest a process for facilitating compliance with these standards.[31] World-wide commerce in both distribution system components and DER apparatus make it increasingly problematic to develop effective standards that avoid either unintended consequences or intentionally divided markets. Thus, ORA supports the Draft Guidance's proposal that IOUs take an explicit inventory of available and planned national and international open standards, assess these standards for their relevance and comprehensiveness[32] to their DRP efforts, and with the purpose of maximizing reliance on national and international

[30] Draft Guidance at 22.

[31] *Id*.

[32] For example, the IOUs should be prepared to identify to the Commission all safety standards relevant to DER integration.

standards, and minimizing reliance on proprietary or local standards.[33] National and international open standards should be preferred over proprietary standards not only for the significant role they play in world-wide electrotechnology industries,[34], [35], [36], [37], [38] but also as it has been established by Commission policy to do so, in support of open architecture and interoperability for nearly 18 years.[39]

The Commission noted in D.97-12-048, that open architecture and interoperability have been described as:

> "an environment where the specifications for interfaces, services, protocols and data formats are vendor-neutral, published, freely available, and agreed upon in an open process under the auspices of a recognized national or international standards body."[40] The Commission stated that open architecture allows interoperability to occur. Interoperability refers to the creation of specifications that allow dissimilar devices or systems to communicate with each other in a way that is transparent to the users. Through interoperability, customers are able to choose from multiple suppliers of electric services."[41]

National and international standards are the formal embodiment of those open architecture specifications. Any delineation of how DERs can support higher levels of

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[33] At the same time, the Commission might also address the extent to which the Commission desires its own staff to have regular involvement in standards development activities, such as those promulgated by the American National Standards Institute (ANSI) or its affiliates, such as the Institute of Electrical and Electronics Engineers (IEEE).

[34] *See,* International Standards Organization, "ISO Standards in action/Energy efficiency and renewables," at http://www.iso.org/iso/home/news_index/iso-in-action/energy.htm

[35] *See,* American National Standards Institute, "Standards Activities Overview," at http://www.ansi.org/standards_activities/overview/overview.aspx?menuid=3

[36] *See* Institute of Electrical and Electronics Engineers, "Leading Global Standards Organizations Endorse 'Open Standard Principles That Drive Innovation and Borderless Commerce," at http://standards.ieee.org/news/2012/openstand.html

[37] *See,* International Electrotechnical Commission and Institute of Electrical and Electronics Engineers, "Guide to IEC/IEEE Cooperation," at http://standards.ieee.org/develop/intl/iec_ieee_coop.pdf- 777.4KB

[38] *See,* IEEE, "IEC-IEEE Challenge -How Does Electrotechnology Impact Economic, Social and Environmental Development?" at http://standardsinsight.com/engineering_education/iecieeechallenge

[39] See D.96-10-074, as cited in D.97-05040, at 42 mimeo.

[40] D.97-12-048 at 9.

[41] CPUC; D.98-12-080, dated Dec. 17, 1998; at 66 mimeo.

reliability and safety must be measurable, characterizing input-output relationships numerically, so as to support effective analytical tools used by customers, developers, and regulators, alike.

Lastly, while individual customers-generators can and must look to their equipment vendors and contractors for premises-specific safety considerations, only the distribution system operator can effectively assemble area-wide, distribution line-specific information for first responders.

F. Barriers to Deployment: Add the Category of "Developer" and Expand the Definition of "Grid Insight"

ORA agrees that the DRPs should identify barriers to deployment of DER and classify them in one of three classes: (1) Barriers to integration/interconnection of DERs onto the distribution grid, (2) Barriers that limit the ability of DER to provide benefits, and (3) Barriers related to distribution system operational and infrastructure capability to enable DER provision of benefits.[42] The Draft Guidance also states that within each of the three classes, the top three barriers in each class should be identified.[43] Once these barriers are identified, each should be categorized as follows: Statutory, Regulatory, Grid Insight, Standards, Safety, Benefits Monetization, and Communications.[44] ORA agrees with these categories but recommends one additional category be included that may facilitate DER deployment. This category is "Developer." This category may be defined to include developer obstacles, such as land cost or right-of-way costs, or insufficient land to develop DER. Successful integration of DERs into the distribution grid will also depend on whether developers are able to interconnect at their preferred locations.

The category of "Grid Insight" is currently defined as "lack of visibility into distribution system conditions, Bulk Electric System conditions, or actual performance of DER that limit DER deployment of operations."[45] ORA recommends that the definition

[42] Draft Guidance at 22.

[43] *Id*.

[44] *Id*.

[45] Draft Guidance at 23.

of "Grid Insight" be extended to include costly distribution system upgrades triggered by DER interconnection. One of the barriers in the interconnect process has been the uncertainty in the cost of interconnection[46] due to unforeseen distribution upgrade costs. The identification of costly upgrades to the distribution system in the DRPs may help developers better choose locations for interconnection and avoid delays[47] in the interconnection process.

G. DRP Coordination with Utility General Rate Cases: The Costs of Any Electrical Corporation to Upgrade the Distribution Infrastructure to Accomplish the DRPs should be Evaluated to be Just and Reasonable

ORA supports the Draft Guidance to direct the utilities to include a section in their DRPs where they describe what specific actions or investments may be included in their next General Rate Cases (GRCs) as a result of the DRP process.[48] The Draft Guidance correctly notes that it is currently too early to direct the IOUs to integrate any given piece of the DRP in their next GRC filing.[49] The Draft Guidance further notes that as the analytical tools and demonstration projects required of the DRPs come to fruition, the interface with each utility's GRC should become clearer. Thus, ORA recommends that the IOUs' forecast of costs be incurred in order to upgrade the distribution infrastructure to accomplish the DRPs should be evaluated to be just and reasonable.

H. Phasing of Next Steps: The DRP Process Should be a Living One

ORA supports the Draft Guidance's proposal that the DRP process should be a living one, where the Commission, the IOUs and stakeholders engage to continuously

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[46] The aim of the cost certainty process being discussed in the Rule 21 proceeding (R.11-09-011) is to streamline the interconnection process into the grid by providing a fixed cost for developers to interconnect.

[47] Under Rule 21, interconnection projects are studied in a serial study process. When an applicant in the interconnection queue changes project specification or withdraws due to costs it also affects other later queued projects.

[48] Draft Guidance at 23.

[49] *Id.*

refine the activities and goals that are central to the DRPs themselves.[50] The DRPs will be more effective if they serve as the starting point in an on-going effort to integrate DERs into distribution planning, operations and investments.[51] Therefore, ORA agrees that the IOUs should include in their DRPs a plan for how their DRPs can be updated biennially.[52]

ORA also supports the Draft Guidance's requirement for the IOUs to include in their DRPs a "Phasing of Next Steps" and that the contents of the DRP process should be phased over the next 10 years.[53] Specifically, ORA recommends that the phasing and rolling updates to the DRPs should occur every two years for the next ten years, including a clear mapping of subsequent DRP phases, to coincide with each IOU's GRC proceeding, the long-term procurement plan and transmission planning process. This will help to update the status of the distribution system in terms of DER deployment and associated system impacts.[54]

III. CONCLUSION

ORA supports the Draft Guidance, with modifications and recommendations as set forth in these comments.

[50] Draft Guidance at 24.

[51] *Id* at 23-24.

[52] *Id*; Reply Comments of ORA on the Order Instituting Rulemaking Regarding Policies, Procedures and Rules for Development of Distribution Resource Plans (filed on October 6, 2014) at 13-14.

[53] Draft Guidance at 24-25.

[54] *Id*.

Respectfully submitted,

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VERIFICATION

I, James M. Ralph, am an attorney for the Office of Ratepayer Advocates which is a party herein, and am authorized to make this verification on ORA's behalf. The statements in the foregoing document are true of my own knowledge, except as to matters which are therein stated on information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury that the foregoing are true and correct.

Executed on December 12, 2014 at San Francisco, California.

/s/ JAMES M. RALPH

James M. Ralph
Attorney